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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

ANTHONY WEBSTER, individually, and }
on behalf of all others similarly situated, }
} Plaintiff, }
} vs. } Civil No. 25-CV-017J
}
ROCKY MOUNTAIN RECOVERY }
SYSTEMS, INC., }
} Defendant. }

***UNOPPOSED MOTION TO CONTINUE INITIAL PRETRIAL
CONFERENCE***

Defendant, Rocky Mountain Recovery Systems Inc., (“RMRSI”) by and through its counsel, hereby respectfully files this motion to continue the Initial Pretrial Conference scheduled for March 6, 2025 until on or after March 27, 2025 and states in support as follows:

1. Plaintiff filed his *Complaint* on January 16, 2025.
2. RMRSI answered the *Complaint* on February 7, 2025 through its Vice President Dan B. Wilkerson, who is a licensed Wyoming attorney.
3. On February 26, 2025, RMRSI retained undersigned counsel to represent it in this action.

4. Currently, an Initial Pretrial Conference before this Court is set for March 6, 2024.

5. The parties' Joint Report is due February 27, 2025.

6. In order for RMRSI to prepare adequately and contribute meaningfully to both the Joint Report and the Initial Pretrial Conference, undersigned counsel requests this Court continue the Initial Pretrial Conference until on or after March 27, 2025.¹

7. Further, allowing additional time will allow RMRSI to participate in the Initial Pretrial Conference with a better understanding of the discovery and scheduling needed in this action.

8. RMRSI requests this Court reset the Joint Report deadline seven calendar days prior to the new Initial Pretrial Conference date.

9. Plaintiff's counsel does not oppose this *Motion*.

Dated: 26 February 2025.

ROCKY MOUNTAIN RECOVERY SYSTEMS
INC., Defendant

BY: s/Jacob L. Vogt

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¹ The parties met and conferred regarding this *Motion* and Plaintiff's counsel stated they would be unavailable between March 10 and March 24, and with limited availability through March 27, 2025, due to a scheduling conflict. Therefore, the parties request a setting on or after March 27, 2025.

CERTIFICATE OF SERVICE

I certify the foregoing ***Unopposed Motion to Continue Initial Pretrial Conference*** was served upon all parties to this action pursuant to the Federal Rules of Civil Procedure on 26 February 2025, and that copies were served as follows:

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